EXHIBIT A

III. Interrogatories

Interrogatory No. 1:

State in detail the development, implementation, and updates to the Network Architecture(s) that pertain to or enable the Accused Functionality in the United States. Your answer should identify the persons involved in designing and implementing the relevant Network Architecture components, the relevant dates (including when the decision was made to implement the Accused Functionality, when the Accused Functionality was actually implemented, and any development milestones in between), why You decided to implement the Accused Functionality, and a narrative description explaining the interrelationship between the relevant Network Architecture components that operate to enable the Accused Functionality.

Interrogatory No. 2:

Identify, by name and model number (including any third party vendor name, any internal or third party model number(s) and/or any commercial name(s)), all hardware and/or software components in any Network Architecture made, sold, operated, utilized, or otherwise provided by You that implements, in whole or part, the Accused Functionality in the United States. For each component identified, please identify (a) the cellular network standard(s) (*e.g.*, 4G, 4G LTE, 5G) for which the component is utilized; (b) how the component contributes to implementation of the Accused Functionality in Your network; (c) the manufacturer of the component; (d) the date on which the component was installed in Your network; (e) the date on which the component was removed from Your network (if applicable); (f) the date(s), if any, on which any software on the component was installed, updated and/or changed, and the version number(s) for any such software; and (g) to the extent You contend any such installation, update and/or change impacts whether or not the component practices any elements of the Asserted Claims, please provide any factual basis for that contention.

Interrogatory No. 3:

With respect to each component identified by You in response to interrogatory number 2, identify all costs associated with the component, including, but not limited to, all upfront costs, all ongoing costs, and all maintenance costs.

Interrogatory No. 4:

Identify the date that You contend is the date for the hypothetical negotiation under *Georgia-Pacific Corp. v. U.S. Plywood Corp.* and describe why You contend that is the proper date.

Interrogatory No. 5:

Identify every entity that You have asserted has an obligation to indemnify You for damages, costs, and/or fees related to this lawsuit, and identify all documents (e.g., letters, emails, agreements) relating to that indemnity by Bates number.